

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION

ANTONIO DIAZ

Plaintiff,

VS.

LANDSTAR INWAY, INC., *et al.*

Defendants.

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CIVIL ACTION NO. 5:16-CV-00317

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**PLAINTIFF'S AMENDED DESIGNATION OF EXPERT WITNESSES**

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Plaintiff, by and through his attorney of record, hereby designates his expert witnesses in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court as well as designation of non-retained experts and fact witnesses and state the following persons may be

**I. RETAINED EXPERTS**

1. Andrea Bradford, M. Ed., CRC  
Physician Life Care Planning  
11550 IH-10 West, Suite 375  
San Antonio, Texas 78230  
(210) 501-0995

Ms. Andrea Bradford, M. Ed., CRC is a certified vocational specialist and rehabilitation counselor who has provided services for the severely disabled since 2009. She is also a member of the International Association of Rehabilitation Professionals and American Board of Vocational Experts.

Ms. Bradford earned a Bachelor of Arts from Baylor University and continued her education by completing a master's program in Rehabilitation Counseling from The University of Texas at Austin. Ms. Bradford also did an internship at the Department of Assistive and Rehabilitative Services (DARS) in Austin, Texas. Her expertise includes serving as a provider of vocational evaluation, job readiness and job placement services.

Ms. Bradford will review and form opinions regarding all medical and billing records in this case regarding the injuries of Mr. Antonio Diaz, as well as Mr. Diaz's deposition testimony. She has also conducted an in person interview and examination of Mr. Diaz, reviewed his income tax returns from 2011-2015, and conducted vocational tests.

Ms. Bradford's testimony may include evaluation and testing of Mr. Diaz, total loss in wage earning capacity, labor market access, and work life expectancy among other topics.

Ms. Bradford's expert report, four year testimony list, and curriculum vitae are attached hereto as Exhibit A.

2. Victoria Morgan, FHFMA  
Victoria Morgan & Associates  
P. O. Box 923035  
Sylmar, California 91392

Ms. Morgan is a certified healthcare financial specialist. Her experience involves working with several large multi-hospital business offices as well as many years working with single facilities, including many Critical Access Hospitals. She has been active with HFMA (Healthcare Financial Management Association) since 1983, having served the Southern California Chapter as Chapter President and Region 11 as Regional Executive.

She earned an undergraduate degree in Health Science/Health Administration from California State University-Northridge. She furthered her education by earning a Masters of Science in Health Administration from California State University-Northridge. She has been involved with implementation of several billing editors including SSI, Cirius and Relay Health: EPremis.

Ms. Morgan is expected to testify regarding the total cost of all reasonable and necessary future medical expenses that in all likelihood will be incurred by Mr. Diaz in the future due to this injuries sustained as a direct result of the incident forming the grounds of this lawsuit. Ms. Morgan's expert report, four year testimony list, and Curriculum Vitae are attached hereto as Exhibit B.

## **II. NON-RETAINED EXPERTS**

Trooper Adrian Solis  
Texas Department of Public Safety  
1901 Bob Bullock Loop  
Laredo, Texas 78043-9771  
(956) 724-3549

*Trooper Solis was dispatched to the scene of the accident and conducted an investigation of the accident in question.*

Each healthcare provider listed below is a non-retained expert and includes the named provider as well as employees, agents, representatives and Custodian of Records of the named healthcare provider/non-retained expert:

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Doctors Hospital of Laredo  
10700 McPherson Rd  
Laredo, Texas 78045  
(956) 523-2000

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Angel Care Ambulance Service  
4205 Jaime Zapata Memorial Hwy.  
Laredo, Texas 78043  
(956) 725-7484

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Jose G. Dones-Vasquez, MD  
597 W. Sesame Dr., Suite D  
Harlingen, Texas 78550-8364

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Harlingen Anesthesia Associates  
1702 N. Ed Carey Drive  
Harlingen, Texas 78550-8202

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Jose Castro, CST CFA  
P.O. Box 23  
Edinburg, Texas 78540

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

North Brownsville Surgery Center  
5700 North Expressway 77  
Brownsville, Texas 78526-4358

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

PRN Neuro Monitoring Services, Ltd.  
213 N. 15<sup>th</sup> Street

McAllen, Texas 78501

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Laredo Family Health Center  
118 W. Village Blvd.  
Laredo, Texas 78041  
(956) 725-5620

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz:

Laredo Open MRI  
209 W. Village Blvd. #6  
Laredo, Texas 78041  
(956) 728-1177

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Miramar Pain Management  
1125 James St. #C  
Weslaco, Texas 78596  
(956) 968-2284

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Harlingen Spine and Neurological Institute  
597 Sesame Dr. #D  
Harlingen, Texas 78550  
(956) 423-3706

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Isla Physical Therapy  
1405 Jacaman Rd. #102  
Laredo, Texas 78041  
(956) 753-2700

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Pharr Family Pharmacy  
710 Cage Blvd.  
Pharr, Texas 78577  
(956) 782-8494

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:

Webb Emergency Medicine Associates  
10700 McPherson Ave.  
Laredo, Texas 78045-6268

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:  
Laredo Diagnostic Imaging  
1700 East Saunders  
Laredo, Texas 78041

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:  
Neurological Associates of San Antonio  
4410 Medical Dr. #610  
San Antonio, Texas 78229  
(210) 614-2453

All doctors, nurses, technicians and other support personnel who provided care and treatment to Antonio Diaz at:  
Ultimate Diagnostic Center  
6010 McPherson Rd., Suite 140  
Laredo, Texas 78041-6206  
(956) 620-8383

Each healthcare provider listed above is a non-retained expert and includes the named provider as well as employees, agents, representatives and Custodian of Records of the named healthcare provider/non-retained expert. Plaintiff may be requesting that each testify by deposition or live at trial. Each healthcare provider/non-retained expert will testify about healthcare or medical issues within his/her area of expertise.

Each healthcare provider/non-retained expert is expected to testify regarding his/her area of education, experience, and credential as a physician or healthcare provider. Each treating healthcare provider/non-retained expert has reviewed all of the medical records and medical bills he or she has generated concerning Plaintiff Antonio Diaz. Each treating healthcare provider/non-retained expert may testify concerning diagnosis(es), treatment, recommendations, and prognosis(es) for Plaintiff Antonio Diaz. Each healthcare provider/non-retained expert will

testify about the nature and severity of Plaintiff Antonio Diaz's injuries. Each treating healthcare provider/non-retained expert is familiar with the reasonable and customary charges for medical treatment of the type that Plaintiff Antonio Diaz has received. Each healthcare provider/non-retained expert is of the opinion that the medical bills and expenses incurred by Plaintiff were reasonable and necessary.

### **III. FACT WITNESSES**

Each fact witness listed below has personal knowledge of Plaintiff's pain, suffering, mental anguish, and loss of enjoyment of life. Each is expected to testify as to all losses, physical, emotional, and economic suffered by Plaintiff.

1. Antonio Diaz  
c/o William R. Ogden  
FARRAR & BALL, LLP  
1010 Lamar, Ste. 1600  
Houston, Texas 77002  
(713) 221-8300  
*Plaintiff*

### **II. DEFENDANT'S AGENTS, EMPLOYEES, AND REPRESENTATIVES**

1. Octavian Dobos  
c/o George "Rusty" Meurer  
KAZAN, MEURER & PEREZ, LLP  
211 Calle Del Norte, Suite 100  
Laredo, Texas 78041  
(956) 712-1600  
*Defendant*

Landstar Inway, Inc.  
c/o George "Rusty" Meurer  
KAZAN, MEURER & PEREZ, LLP  
211 Calle Del Norte, Suite 100  
Laredo, Texas 78041  
(956) 712-1600  
*Defendant*

**IV. DEFENDANTS' EXPERT WITNESS DESIGNATIONS**

Plaintiff hereby includes all expert witnesses contained in Defendants' Expert Designations.

Respectfully submitted,

**FARRAR & BALL, LLP**

/s/ William R. Ogden

Wesley Todd Ball

State Bar No. 24038754

Federal Bar No. 431881

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1010 Lamar, Suite 1600

Houston, Texas 77002

(713) 221-8300 – Telephone

(713) 221-8301 – Facsimile

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this document upon each attorney of record via CM/ECF on this 12<sup>th</sup> day of October 2017.

George "Rusty" Meurer  
KAZAN, MEURER & PEREZ, LLP  
211 Calle Del Norte, Suite 100  
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(956) 712-1600

/s/ William R. Ogden

WILLIAM R. OGDEN